

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

**JONATHAN OLMEDA RAMOS**  
**SARID DE JESUS RESTO ACEVEDO**

Debtor(s)

CASE NUMBER: **15-10081-ESL**

CHAPTER 13

**TRUSTEE'S MOTION TO DEEM PLAN AMENDED**  
**NOTICE AND CERTIFICATE OF SERVICE**

TO THE HONORABLE COURT:

COMES NOW, Alejandro Oliveras Rivera, Standing Chapter 13 Trustee, and very respectfully ALLEGES, STATES and PRAYS:

1. The plan dated 2/20/2016 was confirmed by this Honorable Court (dkt#16). After confirmation, trustee filed a motion for the plan to be deemed amended to include charges included in BANCO POPULAR DE PUERTO RICO's "Notice of Post-Petition Mortgage Fees, Expenses and/or Charges", filed on 03/06/2017. See Trustee's Motion to modify (dkt#40); Order granting Trustee's Motion to Modify (dkt#41).
2. Thereafter, BANCO POPULAR DE PUERTO RICO filed another "Notice of Post-Petition Mortgage Fees, Expenses and Charges on 3/01/2018, in the amount of \$150.00
3. The trustee respectfully requests from this Honorable Court to grant Trustee's motion to modify and deem amended the plan since it is sufficiently funded to cover said fees, expenses and/or charges.
4. Debtor(s) is/are not member(s) of the U.S. Armed Forces, the Coast Guard, the Public Health Service or the National Oceanic and Atmospheric Administration, as evidenced by the Certificate issued by the U.S. Department of Defense, copy of which is attached only to the original of this motion and movant's copy.

**WHEREFORE**, it is respectfully requested to this Honorable Court to grant Trustee's motion to modify and deem amended the plan since it is sufficiently funded to cover said claim.

**NOTICE:** Within twenty-one (21) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the clerk's office of the United States

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MOTION TO MODIFY PLAN  
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Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the court, the interest of justice requires otherwise.

**CERTIFICATE OF SERVICE:** I hereby certify that on this date I electronically filed the above document with the Clerk of the Court using the CM/ECF System which sends notification of such filing to all those who in this case have registered for receipt of notice by electronic mail. I further certify that the foregoing has been served to U.S. Trustee at ustpreion21.hr.ecf@usdoj.gov, and by depositing true and correct copies thereof in the United States Mail, postage prepaid, to the non ECF/CM participants, to debtor(s) and all parties in interest.

**RESPECTFULLY SUBMITTED** at San Juan, Puerto Rico, this 8<sup>th</sup> day of March, 2018.

**/s/ALEJANDRO OLIVERAS RIVERA**

ALEJANDRO OLIVERAS RIVERA  
Chapter 13 Trustee  
PO Box 9024062  
San Juan, PR 00902-4062  
Phone 787-977-3500  
Fax 787-977-3521  
CCC-SHRV

15-10081-ESL

## CERTIFICATE OF MAILING

The undersigned hereby certifies that a true copy of the foregoing document was mailed by first class mail or electronically sent to the parties listed below:

## ATT SERVICES

PO BOX 192830  
SAN JUAN, PR 00919

## BANCO POPULAR

C/O COLON SANTANA AND ASOCIADOS  
315 COLL AND TOSTE  
SAN JUAN, PR 00918

## BANCO POPULAR DE PUERTO RICO

BANKRUPTCY DEPARTMENT  
PO BOX 366818  
SAN JUAN, PR 00936

## BANCO POPULAR DE PUERTO RICO

MORTGAGE SERVICE DEPT 761  
PO BOX 362708  
SAN JUAN, PR 00936-2708

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MORTGAGE SERVICE DEPT 761  
PO BOX 362708  
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## BP-CRLINE

SERV DE CREDITO A INDIVIDUOS  
SAN JUAN, PR 00936

## COOP A/C DEL VALENCIANO

C/O LUIS FRED SALGADO  
PMB 15 267 CALLE SIERRA MORENA  
SAN JUAN, PR 00926-5583

## COOP A/C DEL VALENCIANO

PO BOX 1510  
JUNCOS, PR 00777-1510

## COOP A/C DEL VALENCIANO

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JUNCOS, PR 00777-1510

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## COOP A/C LAS PIEDRAS

PO BOX 414  
LAS PIEDRAS, PR 00771-0414

## COOP A/C VALENCIANO

PO BOX 1510  
JUNCOS, PR 00777

## DEPTEDNELNET

121 S 13TH ST  
LINCOLN, NE 68508

DATED: March 08, 2018

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- CASE NO 15-10081-ESL

/S/RENE GOMEZ

OFFICE OF THE CHAPTER 13 TRUSTEE

15-10081-ESL

Document of Page 4 of 9

The undersigned hereby certifies that a true copy of the foregoing document was mailed by first class mail or electronically sent to the parties listed below:

DEPTO DE TRANSPORTACION Y OBRAS PUBLICAS  
PO BOX 41269  
SAN JUAN, PR 00940-1269

ECMC  
LOCKBOX 8682  
PO BOX 16478  
ST PAUL, MN 55116-0478

ECMC  
PO BOX 16408  
ST PAUL, MN 55116-0408

JONATHAN OLMEDA RAMOS  
HC 08 BOX 38793  
CAGUAS, PR 00725

MARIBEL MENDEZ CRUZ  
C/O FREDESWIN PEREZ CABALLERO ESQ  
PO BOX 723  
CAGUAS, PR 00726

QUANTUM3 GROUP LLC  
AS AGENT FOR SADINO FUNDING LLC  
PO BOX 788  
KIRKLAND, WA 98083-0788

RELIABLE FINANCIAL SERVICES  
C/O CARLOS E PEREZ PASTRANA  
PO BOX 21382  
SAN JUAN, PR 00928-1382

RELIABLE FINANCIAL SERVICES  
PO BOX 21382  
SAN JUAN, PR 00928-1382

RELIABLE FINANCIAL SERVICES  
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RELIABLE FINANCIAL SERVICES  
PO BOX 21382  
SAN JUAN, PR 00928-1382

SISTEMA DE RETIRO  
PO BOX 42003  
SAN JUAN, PR 00940-2203

US DEPARTMENT OF EDUCATION  
C/O NELNET  
121 SOUTH 13TH STREET  
SUITE 201  
LINCOLN, NE 68508

US DEPARTMENT OF EDUCATION  
PO BOX 530229  
ATLANTA, GA 30353-0229

US DEPARTMENT OF EDUCATION  
PO BOX 740283  
ATLANTA, GA 30374-0283

DATED: March 08, 2018

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- CASE NO 15-10081-ESL

/S/RENE GOMEZ

OFFICE OF THE CHAPTER 13 TRUSTEE

15-10081-ESL

CERTIFICATE OF MAILING

The undersigned hereby certifies that a true copy of the foregoing document was mailed by first class mail or electronically sent to the parties listed below:

US DEPT OF EDUCATION  
CLAIMS FILING UNIT  
PO BOX 8973  
MADISON, WI 53708-8973

JONATHAN OLMEDA RAMOS and SARID DE JESUS RESTO ACEVEDO  
HC 08 BOX 38793  
CAGUAS, PR 00725

ROBERTO FIGUEROA CARRASQUILLO\*  
R FIGUEROA CARRASQUILLO LAW OFFICE PSC  
PO BOX 186  
CAGUAS, PR 00726-0186

DATED: March 08, 2018

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/S/RENE GOMEZ

OFFICE OF THE CHAPTER 13 TRUSTEE



## Status Report Pursuant to Servicemembers Civil Relief Act

SSN: XXX-XX-8969  
Birth Date:  
Last Name: OLMEDA RAMOS  
First Name: JONATHAN  
Middle Name: E  
Status As Of: Mar-07-2018  
Certificate ID: ONSYFX4JRFJH8W2

On Active Duty On Active Duty Status Date			
Active Duty Start Date	Active Duty End Date	Status	Service Component
NA	NA	No	NA
This response reflects the individuals' active duty status based on the Active Duty Status Date			

Left Active Duty Within 367 Days of Active Duty Status Date			
Active Duty Start Date	Active Duty End Date	Status	Service Component
NA	NA	No	NA
This response reflects where the individual left active duty status within 367 days preceding the Active Duty Status Date			

The Member or His/Her Unit Was Notified of a Future Call-Up to Active Duty on Active Duty Status Date			
Order Notification Start Date	Order Notification End Date	Status	Service Component
NA	NA	No	NA
This response reflects whether the individual or his/her unit has received early notification to report for active duty			

Upon searching the data banks of the Department of Defense Manpower Data Center, based on the information that you provided, the above is the status of the individual on the active duty status date as to all branches of the Uniformed Services (Army, Navy, Marine Corps, Air Force, NOAA, Public Health, and Coast Guard). This status includes information on a Servicemember or his/her unit receiving notification of future orders to report for Active Duty.

Michael V. Sorrento, Director  
Department of Defense - Manpower Data Center  
400 Gigling Rd.  
Seaside, CA 93955

The Defense Manpower Data Center (DMDC) is an organization of the Department of Defense (DoD) that maintains the Defense Enrollment and Eligibility Reporting System (DEERS) database which is the official source of data on eligibility for military medical care and other eligibility systems.

The DoD strongly supports the enforcement of the Servicemembers Civil Relief Act (50 USC App. ? 501 et seq, as amended) (SCRA) (formerly known as the Soldiers' and Sailors' Civil Relief Act of 1940). DMDC has issued hundreds of thousands of "does not possess any information indicating that the individual is currently on active duty" responses, and has experienced only a small error rate. In the event the individual referenced above, or any family member, friend, or representative asserts in any manner that the individual was on active duty for the active duty status date, or is otherwise entitled to the protections of the SCRA, you are strongly encouraged to obtain further verification of the person's status by contacting that person's Service. Service contact information can be found on the SCRA website's FAQ page (Q33) via this URL: <https://scra.dmdc.osd.mil/faq.xhtml#Q33>. If you have evidence the person was on active duty for the active duty status date and you fail to obtain this additional Service verification, punitive provisions of the SCRA may be invoked against you. See 50 USC App. ? 521(c).

This response reflects the following information: (1) The individual's Active Duty status on the Active Duty Status Date (2) Whether the individual left Active Duty status within 367 days preceding the Active Duty Status Date (3) Whether the individual or his/her unit received early notification to report for active duty on the Active Duty Status Date.

## More information on "Active Duty Status"

Active duty status as reported in this certificate is defined in accordance with 10 USC ? 101(d) (1). Prior to 2010 only some of the active duty periods less than 30 consecutive days in length were available. In the case of a member of the National Guard, this includes service under a call to active service authorized by the President or the Secretary of Defense under 32 USC ? 502(f) for purposes of responding to a national emergency declared by the President and supported by Federal funds. All Active Guard Reserve (AGR) members must be assigned against an authorized mobilization position in the unit they support. This includes Navy Training and Administration of the Reserves (TARs), Marine Corps Active Reserve (ARs) and Coast Guard Reserve Program Administrator (RPAs). Active Duty status also applies to a Uniformed Service member who is an active duty commissioned officer of the U.S. Public Health Service or the National Oceanic and Atmospheric Administration (NOAA Commissioned Corps).

## Coverage Under the SCRA is Broader in Some Cases

Coverage under the SCRA is broader in some cases and includes some categories of persons on active duty for purposes of the SCRA who would not be reported as on Active Duty under this certificate. SCRA protections are for Title 10 and Title 14 active duty records for all the Uniformed Services periods. Title 32 periods of Active Duty are not covered by SCRA, as defined in accordance with 10 USC ? 101(d)(1).

Many times orders are amended to extend the period of active duty, which would extend SCRA protections. Persons seeking to rely on this website certification should check to make sure the orders on which SCRA protections are based have not been amended to extend the inclusive dates of service. Furthermore, some protections of the SCRA may extend to persons who have received orders to report for active duty or to be inducted, but who have not actually begun active duty or actually reported for induction. The Last Date on Active Duty entry is important because a number of protections of the SCRA extend beyond the last dates of active duty.

Those who could rely on this certificate are urged to seek qualified legal counsel to ensure that all rights guaranteed to Service members under the SCRA are protected

**WARNING:** This certificate was provided based on a last name, SSN/date of birth, and active duty status date provided by the requester. Providing erroneous information will cause an erroneous certificate to be provided.





## Status Report Pursuant to Servicemembers Civil Relief Act

SSN: XXX-XX-8969  
 Birth Date:  
 Last Name: RESTO ACEVEDO  
 First Name: SARID  
 Middle Name: DE JESUS  
 Status As Of: Mar-07-2018  
 Certificate ID: 3H8P60W64L2T591

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Active Duty Start Date	Active Duty End Date	Status	Service Component
NA	NA	No	NA
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